

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.  
W.A. DREW EDMONDSON, in his capacity as  
ATTORNEY GENERAL OF THE STATE OF  
OKLAHOMA, and OKLAHOMA SECRETARY  
OF THE ENVIRONMENT C. MILES TOLBERT,  
in his capacity as the TRUSTEE FOR NATURAL  
RESOURCES FOR THE STATE OF OKLAHOMA,

Plaintiffs,

vs.

No. 05-CV-0329 GFK-SAJ

TYSON FOODS, INC., TYSON POULTRY, INC.,  
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,  
AVIAGEN, INC., CAL-MAINE FOODS, INC.,  
CAL-MAINE FARMS, INC., CARGILL, INC.,  
CARGILL TURKEY PRODUCTION, LLC,  
GEORGE'S, INC., GEORGE'S FARMS, INC.,  
PETERSON FARMS, INC., SIMMONS FOODS, INC.,  
and WILLOW BROOK FOODS, INC.,

Defendants.

VIDEO DEPOSITION OF DANIEL JOSEPH PARRISH  
TAKEN ON BEHALF OF THE DEFENDANTS  
ON JANUARY 14, 2008, BEGINNING AT 9:37 A.M.  
IN OKLAHOMA CITY, OKLAHOMA

Videographer: Stephanie Britton  
Reported by: Lana L. Phillips, CSR, RPR

## APPEARANCES:

On behalf of the PLAINTIFF STATE OF OKLAHOMA:

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On behalf of the DEFENDANT GEORGE'S, INC. AND

GEORGE'S FARM, INC.:

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On behalf of the DEFENDANT PETERSON FARMS:

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1 Cal-Maine defendants.

2 MR. TUCKER: John Tucker for  
3 Cargill.

4 MS. GRIFFIN: Jennifer Griffin for  
5 Willow Brook Foods.

6 THE VIDEOGRAPHER: The court  
7 reporter will now swear the witness.

8 DANIEL JOSEPH PARRISH,  
9 having been first duly sworn, deposes and says in  
10 reply to the questions propounded as follows:

11 DIRECT-EXAMINATION

12 BY MR. McDANIEL:

13 Q Good morning, sir.

14 A Good morning.

15 Q Would you state your full name,  
16 please.

17 A Daniel J. Parrish, P-a-r-r-i-s-h.

18 Q What does the J stand for?

19 A Joseph.

20 Q Okay. Sir, what is your employment?

21 A I'm employed with the Oklahoma  
22 Department of Agriculture, Food, and Forestry.

23 Q What's your title or your position?

24 A I am title of the Agricultural  
25 Environmental Management Services division,

1 operator in the Illinois River watershed who is  
2 currently operating in violation of his or her  
3 animal waste management plan?

4 If you can answer it yes or no, I  
5 request that you do so.

6 MR. GARREN: Same objection.

7 THE WITNESS: I cannot answer it yes  
8 or no.

9 Q (BY MR. McDANIEL) You can't tell me  
10 what you're aware of?

11 A I can't answer if anyone is in  
12 violation of our laws and rules, because I'm not  
13 out to every operation every day, nor is our  
14 staff out to every operation every day.

15 There's not enough state troopers to  
16 pick up everybody that's speeding on the roads.

17 Q I understand that point, sir, and  
18 it's been made multiple times by you.

19 My question is: Are you aware of  
20 any operator -- poultry operator in the watershed  
21 that is currently in violation of their plan?

22 A I am not aware of any today. But  
23 that answer can only be said by saying that we do  
24 not have enough staff to be able to determine  
25 that on a daily, hourly basis.